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Subject: Farm Bill 2007 Official Comments - 12/23/2005 05:27 PM CST

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Question1: 1) From my experience in working as a consultant in the organic industry, I think the Organic certification cost share program (Sec. 10606 from 2002 farm bill) should be sufficiently funded to allow all qualified farmers to benefit from this program. This program helps many small and mid-sized farms.

2) I support other financial incentives including tax breaks for transitioning to organic should be offered

Question2: The USDA AMS National Organic Program should comply with international standards for certification and accreditation, as defined by the International Organization for Standardization (ISO). Specifically, the USDA should comply with ISO/IEC 17011 (regarding general requirements for accreditation bodies accrediting conformity assessment bodies) and ISO Guide 65 (which specifies general requirements that a third-party operating a product or service certification system shall meet if it is to be recognized as competent and reliable). Adherence to these Programs ensures that accreditation and certification agencies operate in a consistent and reliable manner. At this time, domestic certifiers receive more audits from the NOP than do the foregin certifiers that are accredited by the NOP!creditation . Question3:

Organic producers continue to receive a disproportionately small share of USDA resources. I think the amount of funding allocated to programs that support and encourage organic agriculture should be at least proportionate to the organic industry's contritubion to the US retail food sales--about 2%. This is the minimum! Considering the ecological and health benefits to organic production, I think the USDA should encourage organic production by allocating even more funding to education, research, and marketing related to organic foods and fiber. Here are some examples:

1) EQIP funds should be used for offering incentive payments for growers to transition to organic production and other environmental practices.

- 2)CSP should be restructured to work better for organic producers. Basic organic practices such as cover cropping and crop rotations should be prioritized, and organic farm plans should be accepted as proof of compliance with the highest tier (III) of conservation.
- 3) An organic program should be developed within the USDA ARS with the oversight of a National Program Leader (NPL) for Organic Agriculture.
- 4) USDA CSREES: funding for the The Integrated Organic Program (IOP) should be increased to \$10 M mandatory per year. Expansion of this program should focus on a higher number of smaller grants.
- 5) The USDA CSREES Integrated Pest Management Centers should have a role in expanding the USDA organic portfolio. The development of ?Strategic Plans for Organic Best Management Practices? is a potential way these centers could better serve the organic sector.

- 6) Land Grant Universities should be directed to spend an increased percentage of agriculture research dollars on organic through an amendment of the Hatch Act.
- 7) The 2007 Farm Bill should amend the Smith-Lever Act to direct the Cooperative Extension to spend an increased percentage of agriculture extension dollars on organic should be considered.
- 8)Expanded data on the organic sector is essential to better understanding the organic industry?s growth and trends. The Organic Production and Marketing Data Initiative provided for in the Farm Security and Rural Investment Act of 2002 Farm Bill should be fully implemented.

Question4: 1)The Conservation Security Program, could be very helpful for organic farmers if restructured a bit. The probram should be fully funded as an uncapped entitlement program as stipulated in the 2002 Farm Bill. CSP should be restructured to work better for organic producers and language should be added to the authorization to ensure that the program effectively serves the organic community. For example, basic organic practices such as cover cropping and crop rotations should be prioritized. Also, organic farm plans should be accepted as proof of compliance with the highest tier (III) of conservation.

- 2) Transition payments for transition to organic production should be added to Environmental Quality Incentives program (EQIP) nation priorities
- 3) Technical Assistance Providers- Funding and programmatic direction is needed for technical assistance providers specific to organic.
- 4)NRCS needs a point person for organic agriculture who will coordinate how organic production is treated by the USDA conservation programs and does outreach to the organic community.

Question5:

Question6: 1) As mentioned above, I strongly support the Organic certification cost share program (Sec. 10606 from 2002 farm bill. I think it should receive a mandatory \$2 M per year.

- 2) Organic research funding should be dramatically increased to reflect at least its commensurate share of research dollars.
- 3) The National Research Initiative/Initiative for Future Agriculture and Food Systems (IFAFS) needs to be funded at its authorized level with goals that more firmly address the unique needs of small and medium-sized organic farmers.
- 4) An organic program should be developed within the USDA ARS with the oversight of a National Program Leader (NPL) for Organic Agriculture. ARS should receive a mandatory \$20 M per year for organic research. 5) USDA CSREES: The Integrated Organic Program funding should be increased to \$10 M mandatory per year. Expansion of this program should focus on a higher number of smaller grants. There should be a competitive grant program designed to fund marketing, economic and policy-related research pertinent to the organic industry. Such a grants program would be part of the USDA CSREES Integrated Organic Program and fall under the oversight of the National Program Leader for Organic Agriculture.